

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS  
INTERNATIONAL ASSOCIATION,  
LOCAL 66,

Defendant.

Case No. 2:15-cv-01349 MJP

**SUPPLEMENTAL DECLARATION OF  
CHRISTOPHER L. HILGENFELD IN  
SUPPORT OF NORTHSHORE'S  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
FOR INJUNCTIVE RELIEF**

I, CHRISTOPHER L. HILGENFELD, declare as follows:

1. I am over the age of eighteen (18) years and I am competent to testify if called upon to do so.

2. I am an attorney at Davis Grimm Payne & Marra, counsel of record for Plaintiff Northshore Sheet Metal, Inc. ("Northshore" or "Defendant"), admitted to practice in the U.S. District Court, Western District of Washington. I am the lead attorney representing Northshore Sheet Metal, Inc. in the above-captioned matter, and I make this declaration based upon my personal knowledge and review of the files and records herein.

1           3. Attached hereto as **Exhibit 1** is a true and correct copy of my letter to  
2 Mr. Hutzenbiler and Mr. Carter advising that Northshore accepts the Union's proposal  
3 related to Article XXI – Shop Steward, dated August 25, 2015.

4           4. Attached hereto as **Exhibit 2** is a true and correct copy of my letter to  
5 Mr. Hutzenbiler and Mr. Carter memorializing Northshore's bargaining proposal that had  
6 been provided orally at the bargaining session on August 7, 2015.

7           5. Attached hereto as **Exhibit 3** is are true and correct copies of the letters I  
8 received from Bellevue Police Department Legal Advisor, Melissa Chin, dated August 26,  
9 2015, and Snohomish County Prosecuting Attorney, Lyndsey Downs, Legal Advisor to  
10 Snohomish County Sheriff's Office, dated August 28, 2015. Snohomish County Sheriff  
11 Department asked to provide this letter in lieu of a Subpoena to Wednesday's hearing; the  
12 County had a concern regarding the disruption the subpoena would have on its operations.

13           6. Attached hereto as **Exhibit 4** is a true and correct copy of my letter to  
14 Mr. Hutzenbiler responding to his August 21 letter and advising that Northshore has paid all  
15 monies owed to all entities under the Settlement Agreement and requesting additional  
16 documentary support regarding the Union's assertions of money remaining due to any  
17 employees. This was a follow-up to earlier requests on or about July 13 and July 28.

18  
19 I declare under penalty of perjury under the laws of the State of Washington and the  
20 United States that the foregoing statements are true and accurate.

21 Dated at Seattle, Washington this 28th day of August, 2015.

22  
23   
24 Christopher L. Hilgenfeld